

**CHAITMAN LLP**

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*Attorneys for Defendants The Lawrence J. Ryan  
and Theresa R. Ryan Revocable Living Trust, The  
Lawrence J. Ryan By-Pass Trust Under  
Declaration of Trust Dated, 11/20/1991, and  
Theresa R. Ryan, individually and in her capacities  
as Trustee of The Lawrence J. Ryan and Theresa R.  
Ryan Revocable Living Trust and The Lawrence J.  
Ryan By-Pass Trust Under Declaration of Trust  
Dated L L/20/1991*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 10-05124 (SMB)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC,

Plaintiff,

v.

THE LAWRENCE J. RYAN AND THERESA R.  
RYAN REVOCABLE LIVING TRUST, THE  
LAWRENCE J. RYAN BY-PASS TRUST UNDER  
DECLARATION OF TRUST DATED, 11/20/1991,  
and THERESA R. RYAN, individually and in her  
capacities as trustee of THE LAWRENCE J. RYAN

AND THERESA R. RYAN REVOCABLE LIVING  
TRUST and THE LAWRENCE J. RYAN BY-PASS  
TRUST UNDER DECLARATION OF TRUST  
DATED 11/20/1991,

Defendants.

**NOTICE OF PRESENTMENT OF AN ORDER  
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

**PLEASE TAKE NOTICE** that, upon the annexed Stipulation of Substitution of Counsel in Support of Application to Withdraw as Counsel, dated February 13, 2020 Chaitman LLP, attorney of record for Defendants, The Lawrence J. Ryan and Theresa R. Ryan Revocable Living Trust, The Lawrence J. Ryan By-Pass Trust Under Declaration of Trust Dated, 11/20/1991, and Theresa R. Ryan, individually and in her capacities as Trustee of The Lawrence J. Ryan and Theresa R. Ryan Revocable Living Trust and The Lawrence J. Ryan By-Pass Trust Under Declaration of Trust Dated L L/20/1991, (the “Defendants”) in the above Adversary Proceeding, submits the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature.

Dated: February 20, 2020  
New York, New York

**CHAITMAN LLP**

By: /s/ Helen Davis Chaitman  
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*Attorneys for Defendants The Lawrence J.  
Ryan and Theresa R. Ryan Revocable Living  
Trust, The Lawrence J. Ryan By-Pass Trust  
Under Declaration of Trust Dated,  
11/20/1991, and Theresa R. Ryan,  
individually and in her capacities as Trustee  
of The Lawrence J. Ryan and Theresa R.  
Ryan Revocable Living Trust and The  
Lawrence J. Ryan By-Pass Trust Under  
Declaration of Trust Dated L L/20/1991*